

## Danny Nip

**From:** Jackson, Tressa L (Cupertino) USA <Tressa.Jackson@lehighhanson.com>  
**Sent:** Wednesday, August 28, 2019 1:40 PM  
**To:** Danny Nip  
**Cc:** Gary Lipari  
**Subject:** RE: Lehigh Opacity Monitoring

Danny,

I have identified the section below for CAM that should reflect the PM CEMS and BLDS instead of Opacity Monitor (currently is by M22) as above in the redline permit. The PM CEMS is more sensitive than the opacity monitor and further Table N should match Table O CAM for the Clinker Cooler. Further CAM Condition 23 does not require an Opacity Monitor please see the text on p.501 of the redline, but a PM CEMS and BLDS. Seems like this was missed in the reviews. Please refer to table IV, there is no opacity monitor listed and Method 9 is used for compliance with the Opacity Limit. Then, we would also need to remove opacity CEMS referenced in condition 603 Part 14. Also, Table IV-V & W through Z (and maybe others) has an opacity monitor for finish mill but is should be another method. There never has been a regulatory rule requiring an opacity monitor for a finish mill. It should be Method 22 or 9 and Broken Bag Leak Detector or COMS. We should both take a closer look at the redline and perhaps connect to discuss over phone. Thanks.

Table IV & <del>Table VII</del> N							
Source-specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements							
<del>S-141 Raw Mill 1 (4-GM-1), S-142 Raw Mill 2 (4-GM-2), S-143 Raw Mill 1 Separator system (4-SE-3), S-144 Raw Mill 2 Separator Circuit (4-SE-4), S-171 Kiln Fuel Mill System, S-172 Precalciner Fuel Mill System, S-154 Precalciner Kiln abated by A-141, A-142, A-143, A-144, A-171, A-172 A-141 and A-142 Dust Collectors, and A-171 and A-172 Baghouses, and A-154 Lime/Carbonate Dry/Slurry Injection System, and A-156 Activated Carbon Injection System and A-157 Selective Non-Catalytic Reduction</del>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
<del>9-13-405</del>	<del>Dioxins and Furans (D/F) Emissions Test</del>	<del>Establish correlation between D/F and Temperature</del>	<del>BAAQMD Reg 9-13-604</del>	<del>P every 30 months</del>		<del>Y</del>	<del>N</del>
9-13-501	Emissions Monitoring	CEMS: NO <sub>x</sub> , O <sub>2</sub> or CO <sub>2</sub> ; PEMS: NH <sub>3</sub> , Temperature, Hg, HCl, THC, Operational Integrity of PM control, and Volumetric Flow	BAAQMD Manual of Procedures, Volume V, 40 CFR, Part 63, Appendices	P/C	Y	Y	N

**Table IV & ~~Table VII~~ N**

**Source-specific Applicable Requirements, Applicable Limits &  
Compliance Monitoring Requirements**

S-141 Raw Mill 1 (4-GM-1), S-142 Raw Mill 2 (4-GM-2), S-143 Raw Mill 1 Separator system (4-SE-3), S-144 Raw Mill 2 Separator Circuit (4-SE-4), S-171 Kiln Fuel Mill System, S-172 Precalciner Fuel Mill System, S-154 Precalciner Kiln abated by A-141, A-142, A-143, A-144, A-171, A-172, A-141 and A-142 Dust Collectors, and A-171 and A-172 Baghouses, and A-154 Lime/Carbonate Dry/Slurry Injection System, and A-156 Activated Carbon Injection System and A-157 Selective Non-Catalytic Reduction

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
	<u>(10/19/16)</u>						
<u>9-13-301</u>	<u>Emission Limits</u>	<u>NO<sub>x</sub> &lt; 2.3 lb/ton clinker;</u> <u>PM &lt; 0.04 lb/ton clinker;</u> <u>NH<sub>3</sub> &lt; 270 ppmvd @ 7% O<sub>2</sub></u> <u>D/F &lt; 0.2 ng-TEQ/dscm @ 7% O<sub>2</sub></u> <u>Hg &lt; 55 lb/million ton clinker;</u> <u>THC &lt; 24 ppmvd @ 7% O<sub>2</sub> or</u> <u>o-HAP &lt; 12 ppmvd @ 7% O<sub>2</sub>;</u> <u>HCl &lt; 3 ppmvd @ 7% O<sub>2</sub></u>	<u>BAAQMD</u> <u>Reg 9-13-401</u>	<u>Initial</u> <u>P/A and</u> <u>P/test every</u> <u>30 months</u> <u>for THC and</u> <u>D/F</u>		<u>Y</u>	<u>N</u>
<u>9-13-302</u>	<u>Opacity (combined stack emissions from kiln, raw mills and fuel mills)</u>	<u>&lt; 10% opacity for more than 3 minutes in any hour</u>	<u>BAAQMD 9-</u> <u>13-609</u>	<u>Visual</u> <u>Inspection</u> <u>(M9)</u>		<u>Y</u>	<u>N</u>

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (09/04/98)</b>						
6-301	Ringelmann Number 1 Limitation	OPACITY Ringelmann 1.0 for < 3 min/hr	BAAQMD CAM Condition # 24781, Part 27  63.1350(b)(i)	<del>Pressure</del> <del>Drop</del> <del>Monitoring</del> <del>Filter Bag</del> <del>Leak</del> <del>Detector-</del> <del>P/WC</del>  PM CEMS- P/C (Effective 09/02/01-5)	Once every six months	Y	Y
<u>6-301</u>	<u>Ringelmann Number 1 Limitation</u>	<u>OPACITY</u> <u>Ringelmann 1.0 for &lt; 3 min/hr</u>	<u>BAAQMD</u> <u>CAM</u> <u>condition #</u> <u>24781, Part</u> <u>23</u>	<u>Visual</u> <u>Inspection</u> <u>(M2209) Opac-</u> <u>ity Monitor</u>  <u>P/DC</u>	<u>Once every</u> <u>six months</u>	<u>Y</u>	<u>Y</u>

## VI. Permit Conditions

22. The owner/operator shall keep the records of the pressure drops, visible emission readings, calibrations, test results, excursions and exceedances required by the above conditions for at least 5 years and shall make the records available to District staff upon request. [Basis: Regulation 2-6-501 Recordkeeping]

For the following sources:

S-141 Raw Mill 1 4-GM-1, abated by A-141 Dust Collector

S-142 Raw Mill 2 4-GM-2, abated by A-142 Dust Collector

S-154 Precalciner Kiln, abated by A-141, A-142 Baghouses, and A-171, A-172 Dust Collectors, ~~and~~

A-154 Dry/Slurry Lime Injection System,

A-156 Activated Carbon Injection System, and

A-157 Selective Non-Catalytic Reduction (SNCR) System

S-161 Clinker Cooler, abated by A-161 Dust Collector

S-171 Kiln Fuel Mills System, abated by A-171 Dust Collector

S-172 Precalciner Fuel Mills System, abated by A-172 Dust Collector

23. The owner/operator shall install 44 broken bag leak detectors including alarms at A-141, A-142, A-171, A-172, and A-161 in lieu of conducting the daily visual emissions testing to ensure compliance with BAAQMD Regulation 6-301. [Basis: 40 CFR 63 Subpart LLL]

24. The following definitions apply to the Compliance Assurance Monitoring plan for S-154 and S-161 to assure compliance with Regulation 6:

a. Exceedance is defined as detecting particulate matter emissions at concentrations of greater than 10 milligrams per actual cubic meter.

b. Excursion is defined as any 1 minute particulate matter emission concentration that meets the definition of exceedance.

[Basis: 40 CFR Part 64.6(c)(2)]

**Table IV & Table VII- O**

### Source-specific Applicable Requirements, Applicable Limits &

### Compliance Monitoring Requirements

#### S-161 Clinker Cooler (5-CC-1) ABATED BY A-161 DUST COLLECTOR

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
BAAQMD Regulation 6, Rule 1	Particulate Matter <u>(12/05/078/1/18)</u>						
6-1-301	Ringelmann Number 1 Limitation	OPACITY Ringelmann 1.0 for < 3 min/hr	BAAQMD CAM Condition # 24781, Part 27 63.1350(b)(i)	Pressure Drop Monitoring- P/W PM CEMS- P/C (9/9/2015)	Once every six months	Y	N
6-1-301	Ringelmann Number 1 Limitation	OPACITY Ringelmann 1.0 for < 3 min/hr	BAAQMD CAM Condition # 24781, Part 23; or BAAQMD condition # 20753, part 2	Visual Inspection (M22) or Visual Inspection (M9) P/D	Once every six months	Y	N



<p align="center"><b>Table IV &amp; <del>Table VII</del> – V</b></p> <p align="center"><b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b></p> <p align="center"><b>S-210 Finish Mill (6-GM-1) abated by A-210 Dust Collector</b></p>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter</b> <b>(<del>42 CFR 63.118</del>)</b>						
6-1-301	Ringelmann Number 1 Limitation	OPACITY Ringelmann 1.0 for < 3 min/hr	BAAQMD condition # 779, part 6. BAAQMD CAM condition # 24781, Part 34	Broken Bag Leak Detector Device  P/C	Once every six months	Y	N
<u>6-1-301</u>	<u>Ringelmann Number 1 Limitation</u>	<u>OPACITY</u> <u>Ringelmann 1.0 for &lt; 3 min/hr</u>	<u>BAAQMD CAM condition # 24781, Part 34</u>	<u>Opacity Monitor</u> <u>P/C</u>	<u>Once every six months</u>	<u>Y</u>	<u>N</u>

<p align="center"><b>Table IV &amp; <del>Table VII</del> – V</b></p> <p align="center"><b>Source-specific Applicable Requirements, Applicable Limits &amp; Compliance Monitoring Requirements</b></p> <p align="center"><b>S-210 Finish Mill (6-GM-1) abated by A-210 Dust Collector</b></p>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
<b>LLL</b>							
<u>63.1340(a)</u>	<u>Applicability</u>						<u>Y</u>
63.1340(b)(4)	Applicability						Y
63.1341	Definitions						Y
63.1342	Standards: General	<u>40 CFR part 63, subpart A</u>					Y
63.1343(b)(1)	Opacity ( <u>all operating modes</u> )	OPACITY 10%	63.1349(b)(2) 63.1350(f)(2)	<u>Visible Emissions (Method 22)</u> <u>P/D</u> <u>Follow-up Method 9 (as needed);</u> <u>COMS or BLDS can be used in lieu of daily visible emissions.</u> <u>Initial</u>	once every six months	Y	Y

Table IV & ~~Table VII~~ W

**Source-specific Applicable Requirements, Applicable Limits &  
Compliance Monitoring Requirements  
S-211 Separator (6-SE-2) abated by A-211 Dust Collector**

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
BAAQMD Regulation 6, Rule 1	Particulate Matter ( <del>42/05/078/1/18</del> )						
6-1-301	Ringelmann Number 1 Limitation	OPACITY Ringelmann 1.0 for < 3 min/hr	BAAQMD condition # 1545, part 6, BAAQMD CAM condition # 24781, Part 34	Broken Bag Leak Detection Device  P/C	Once every six months	Y	N
<u>6-1-301</u>	<u>Ringelmann Number 1 Limitation</u>	<u>OPACITY</u> <u>Ringelmann 1.0 for &lt; 3 min/hr</u>	<u>BAAQMD CAM condition # 24781, Part 37</u>	<u>Opacity Monitor</u> <u>P/C</u>	<u>Once every six months</u>	<u>Y</u>	<u>N</u>

Table IV & ~~Table VII~~ Y

**Source-specific Applicable Requirements, Applicable Limits &  
Compliance Monitoring Requirements  
S-218 Air Separator (6-SE-1) abated by A-218 Dust Collector**

Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
BAAQMD Regulation 6, Rule 1	Particulate Matter ( <del>42/05/078/1/18</del> )						
6-1-301	Ringelmann Number 1 Limitation	OPACITY Ringelmann 1.0 for < 3 min/hr	BAAQMD condition # 4997, part 9, BAAQMD CAM condition # 24781, Part 34	Broken Bag Leak Detection Device  P/C	Once every six months	Y	N
<u>6-1-301</u>	<u>Ringelmann Number 1 Limitation</u>	<u>OPACITY</u> <u>Ringelmann 1.0 for &lt; 3 min/hr</u>	<u>BAAQMD CAM condition # 24781, Part 37</u>	<u>Opacity Monitor</u> <u>P/C</u>	<u>Once every six months</u>	<u>Y</u>	<u>N</u>

<p align="center"><b>Table IV &amp; <del>Table VII- Z</del></b></p> <p align="center"><b>Source-specific Applicable Requirements, Applicable Limits &amp;</b></p> <p align="center"><b>Compliance Monitoring Requirements</b></p> <p align="center"><b>S-220 Finish Mill (6-GM-2) abated by A-220 Dust Collector</b></p>							
Applicable Requirement	Regulation Title or Description of Requirement	Limit	Monitoring Citation	Monitoring & Frequency	Reporting	R	FE
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter</b> <b>(<del>12/05/07</del>8/1/18)</b>						
6-1-301	Ringelmann Number 1 Limitation	OPACITY Ringelmann 1.0 for < 3 min/hr	BAAQMD condition # 4998, part 9. BAAQMD CAM condition # 24781, Part 34	Broken Bag Leak Detection Device  P/C	Once every six months	Y	N
<u>6-1-301</u>	<u>Ringelmann Number 1 Limitation</u>	<u>OPACITY</u> <u>Ringelmann 1.0 for &lt; 3 min/hr</u>	<u>BAAQMD CAM condition # 24781, Part 37</u>	<u>Opacity Monitor</u> <u>P/C</u>	<u>Once every six months</u>	<u>Y</u>	<u>N</u>
<del>6-1-301</del>	<del>Particulate Matter</del>						<del>N</del>

Regards,

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**"Important Note:** Please be aware that my **email address has changed** to [Tressa.Jackson@lehighhanson.com](mailto:Tressa.Jackson@lehighhanson.com)."

 Please consider the environment before printing this e-mail.

**From:** Gary Lipari [mailto:GLipari@baaqmd.gov]  
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**Subject:** Fwd: Lehigh Opacity Monitoring

Tressa

FYI

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